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Attorneys for Defendants
CONNETICS CORP., THOMAS G. WIGGANS,
and C. GREGORY VONTZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

PLUMBERS' & PIPEFITTERS' LOCAL #
562 PENSION FUND, On Behalf of Itself
and Others Similarly Situated,

Plaintiff,

v.

CONNETICS CORPORATION,
THOMAS G. WIGGANS, C. GREGORY
VONTZ and ALEXANDER J.
YAROSHINSKY,

Defendants.

Case No. C 06-5691-PJH

**STIPULATION AND ~~PROPOSED~~
ORDER REGARDING FILING OF
CONSOLIDATED COMPLAINT AND
MOTION TO DISMISS BRIEFING
SCHEDULE**

This Stipulation is entered into by and among plaintiff Plumbers' & Pipefitters' Local #
562 Pension Fund and defendants Connetics Corp., Thomas G. Wiggans, C. Gregory Vontz, and

1 Alexander J. Yaroshinsky (collectively, “Defendants”) by and through their respective counsel of
2 record.

3 WHEREAS, two separate actions have been filed in this Court alleging violations of the
4 federal securities laws, *Plumbers’ & Pipefitters’ Local #562 Pension Fund v. Connetics Corp.*,
5 *Thomas G. Wiggans, C. Gregory Vontz, and Alexander J. Yaroshinsky*, Case No. C 06-5691-PJH,
6 and *Almar T. Widiger Living Trust v. Connetics Corp., Thomas G. Wiggans, C. Gregory Vontz,*
7 *and Alexander J. Yaroshinsky*, Case No. C 06-06250-VRW;

8 WHEREAS, plaintiffs in the *Plumbers’ & Pipefitters’ Local #562* and *Almar T. Widiger*
9 *Living Trust* actions have not filed a consolidated complaint;

10 WHEREAS, Defendants’ time to answer, move, or otherwise respond to the complaint in
11 the *Plumbers’ & Pipefitters’ Local #562* action has not expired; and

12 WHEREAS, Defendants intend to file a motion to dismiss all of the claims asserted
13 against them;

14 IT IS HEREBY STIPULATED, pursuant to Northern District of California Civil Local
15 Rule 6-1, by and between the undersigned counsel for the parties that:

16 1. Defendants are not required to respond to the complaint in the action captioned
17 *Plumbers’ & Pipefitters’ Local #562 Pension Fund v. Connetics Corp., Thomas G. Wiggans, C.*
18 *Gregory Vontz, and Alexander J. Yaroshinsky*, Case No. C 06-5691-PJH, other than a
19 consolidated complaint or a complaint designated as the operative complaint;

20 2. Within sixty (60) days after the entry of an order designating a lead plaintiff, the
21 lead plaintiff shall file a consolidated complaint, unless otherwise agreed upon by the parties.
22 The consolidated complaint shall be the operative complaint and shall supersede the complaint in
23 this action;

24 3. Defendants shall respond to the consolidated complaint within sixty (60) days after
25 service, unless otherwise agreed upon by the parties; and

26 4. If Defendants file any motion directed at the consolidated complaint, opposition
27 briefs shall be filed within forty-five (45) days of such motions, and reply briefs shall be filed
28 within thirty (30) days of such oppositions, unless otherwise agreed upon by the parties.

1 IT IS FURTHER STIPULATED, pursuant to Northern District of California Civil Local
2 Rule 6-1, by and between the undersigned counsel for the parties, that the parties may enter into
3 and submit a further appropriate stipulation amending this filing.

4 Dated: October 19, 2006

FENWICK & WEST LLP

5 By: _____ /s/
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12 Attorneys for Defendants CONNETICS
13 CORP., THOMAS G. WIGGANS, and C.
14 GREGORY VONTZ

15 Dated: October 19, 2006

DLA PIPER

16 By: _____ /s/
17 Shirli Fabbri Weiss

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22 Attorneys for Defendant ALEXANDER J.
23 YAROSHINSKY

24 Dated: October 19, 2006

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25 RUDMAN & ROBBINS, LLP

26 By: _____ /s/
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Attorneys for Plaintiff PLUMBERS' &
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FUND

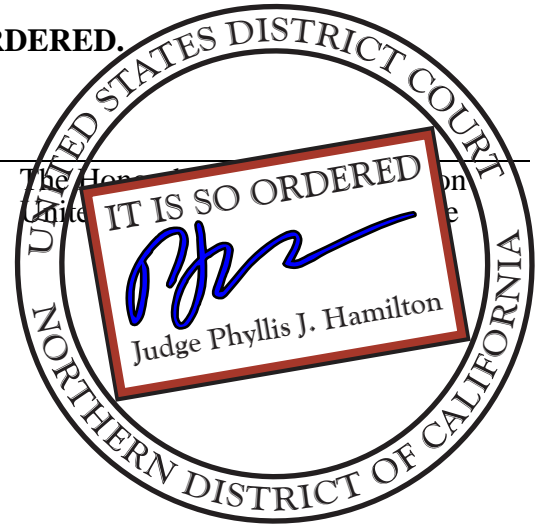
29 Filer's Attestation: Pursuant to General Order No. 45, Section X(B) regarding signatures, I
30 attest under penalty of perjury that concurrence in the filing of the document has been obtained
31 from Shirli Fabbri Weiss and Shawn A. Williams.

* * *

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

DATED: October 27 2006

25251/00501/LIT/1256947.2



FENWICK & WEST LLP
ATTORNEYS AT LAW
MOUNTAIN VIEW